

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	CASE NO. 19-11222-HCM
	§	
HAMMER DOWN OILFIELD SERVICES, LLC	§	CHAPTER 7
	§	
DEBTOR.	§	
	§	

**FIRST INTERIM APPLICATION OF FISHBONE INVESTMENTS, LLC FOR
COMPENSATION AS CONSULTANT FOR CHAPTER 7 TRUSTEE**

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

NOW COMES JOHN PATRICK LOWE (“Trustee”), as the chapter 7 trustee for the estate of Hammer Down Oilfield Services, LLC (“Debtor”), by and through his undersigned Special Counsel, and pursuant to 11 U.S.C. § 327 files this Interim Application of Fishbone Investments, LLC for Compensation as Consultant for Trustee, and respectfully requests approval of the compensation described below, showing the Court as follows:

1. On September 11, 2019 (the “Petition Date”), the Debtor commenced a case by filing a petition for relief under chapter 7 of the Bankruptcy Code (the “Chapter 7 Case”).

2. On January 15, 2020, the Trustee hired Fishbone Investments, LLC and its representatives, including Brian Murphy, to act as a consultant and perform the following: (i) assist the Trustee and his special counsel in the investigation of Debtor’s property that was (a)

damaged in connection with an August 30, 2019 oil and gas well blowout at the GEP Haynesville Well, or (b) stolen; and (ii) assist the Trustee and his special counsel in the investigation of Debtor's property in the possession of third parties for turnover to the Debtor's estate, which was approved by the Court by Order entered on February 19, 2020 [Dkt. #140].

3. The Bank of Brenham, N.A., a secured creditor of Debtor ("Bank"), has agreed to pay Fishbone Investments, LLC its fees and expenses associated with its consulting work for the Trustee in the above-referenced bankruptcy, and also the fee to the Trustee as set forth in Section 326 of the U.S. Bankruptcy Code, subject to the Court's approval through this fee application process.

4. A Compensation Support Exhibit, reflecting contemporaneous time records itemizing services rendered by category in a format which reflects a description of each service entry, the amount of time spent rendering that service, the date the service was performed, who performed that service, and the hourly rate of the person performing that service, is attached hereto as Exhibit "A". The Bank and Fishbone Investments have agreed that, in lieu of seeking the fees and expenses listed in Exhibit A, the Bank will pay Fishbone Investments, LLC a flat fee of \$35,000 for services and expenses rendered through May 6, 2021.

5. Accordingly, Fishbone Investments, LLC seeks fees and expenses through May 6, 2021 in the amount of \$35,000.

WHEREFORE, Trustee requests that Fishbone Investments, LLC be allowed compensation for its fees and expenses through May 6, 2021 in the amount of \$35,000, and for such and further relief as is just.

Respectfully submitted this June 22nd, 2021.

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CHAPTER 7 TRUSTEE FOR THE ESTATE OF
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd day of June 2021, a true and correct copy of the foregoing document was filed with the Court and served electronically upon the following parties registered to receive electronic notice via the Court's CM/ECF system.

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